

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

GABRIELA NIEVES;

Plaintiff,

v.

Case No: 1:20-cv-00320-JMS-DML

CARMEL CLAY SCHOOLS and RED
ROOF INN,

Defendants.

**DEFENDANT CARMEL CLAY SCHOOLS' MOTION
FOR ENTRY OF UNIFORM PROTECTIVE ORDER**

Defendant Carmel Clay Schools ("Defendant"), by counsel, respectfully moves for entry of the Court's Uniform Protective Order, and in support thereof states:

1. Defendant is the process of responding to Plaintiff's written discovery requests.
2. "A party or any person from whom discovery is sought may move for a protective order in the court where the action is pending..." FED. R. CIV. P. 26(c)(1). "The motion must include a certification that the movant has in good faith conferred or attempted to confer with other affected parties in an effort to resolve the dispute without court action." *Id.* "The court may, for good cause, issue an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense." *Id.*
3. As set forth in the Court's Uniform Protective Order, attached hereto as Exhibit A, Defendant anticipates production of the following categories of protected information: personnel records, student records, confidential nonparty business records, and other information that is personal and sensitive to the individual parties or other individuals. Good cause exists for the entry of an order protecting these documents under the terms of the Court's Uniform Protective Order. *See Exhibit A.*

4. The undersigned counsel for Defendant consulted with counsel for Plaintiff and counsel for Red Roof Inn concerning this Motion. Plaintiff does not object to Defendant's Motion. The undersigned counsel contacted counsel for Red Roof Inn by email on Wednesday, June 17, 2020 and Friday, June 19, 2020, but did not receive any response.

WHEREFORE, Defendant, by counsel, respectfully requests that the Court enter the Protective Order set forth in Exhibit A to this Motion, and for all other appropriate relief.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June, 2020, a true and exact copy of the foregoing was filed electronically via the Court's Electronic filing system. Notice of this filing was sent to the following persons by operation of the Court's Electronic filing system.

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